

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

THE UNITED STATES OF
AMERICA *ex rel.* JESSE M.
POLANSKY, M.D., M.P.H.,

Plaintiff,

v.

GEISINGER HOLY SPIRIT;
GEISINGER COMMUNITY
MEDICAL CENTER; GEISINGER
MEDICAL CENTER; SPIRIT
PHYSICIAN SERVICES INC.

Defendants.

Civil Action No.
1:20-CV-00599
(Judge Conner)

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR
DEFENDANTS GEISINGER HOLY SPIRIT AND SPIRIT PHYSICIAN
SERVICES INC. TO RESPOND TO COMPLAINT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendants **Geisinger Holy Spirit (“Holy Spirit”)¹** and **Spirit Physician Services, Inc. (“SPSI”)²** respectfully submit this unopposed motion requesting an extension of their time to answer, move with respect to, or otherwise respond to Plaintiff’s Complaint. In support of this motion, Holy Spirit and SPSI state as follows:

¹ As of November 1, 2020, Geisinger Holy Spirit hospital changed its name and now does business as Penn State Health Holy Spirit Medical Center.

² As of June 22, 2023, Spirit Physician Services, Inc. now does business as Penn State Health Community Medical Group, LLC.

1. Holy Spirit and SPSI were both served with the Complaint on January 22, 2024 and the original deadline for filing a responsive pleading as to these Defendants is February 12, 2024. ECF Nos. 41, 42.

2. Having recently been served with the 100-page Complaint and to conform with the extension request by Geisinger Medical Center and Geisinger Community Medical Center (ECF No. 46), Holy Spirit and SPSI also requested from Plaintiff's counsel an extension to review and evaluate the allegations in the Complaint in order to adequately prepare a response, such that the deadline for all defendants will be April 8, 2024. Plaintiff's counsel has agreed to the requested extension and does not oppose this motion.

3. On February 9, 2024, the Court granted Geisinger Medical Center's and Geisinger Community Medical Center's request to extend their time to respond to the Complaint by sixty (60) days, placing their deadline to respond on April 8, 2024. ECF No. 47. The present motion seeks to extend the deadline for Holy Spirit and SPSI to the same date.

4. This is the first extension requested by Holy Spirit and SPSI in this matter and this extension will not cause undue delay or prejudice to any party.

THEREFORE, Holy Spirit and SPSI respectfully request that the Court grant their request and extend their time to respond to Plaintiff's Complaint to April 8, 2024.

Date: February 12, 2024

Respectfully submitted,

/s/ Daniel T. Brier

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*Attorneys for Geisinger Medical Center,
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Geisinger Holy Spirit, and Spirit Physician
Services, Inc.,*

CERTIFICATE OF CONCURRENCE

I, Matthew L. Knowles, hereby certify that I sought the concurrence of Jeffrey Golan Esquire, counsel for Plaintiff, in this Motion. Mr. Golan concurs in this Motion.

/s/ Matthew L. Knowles
Matthew L. Knowles

Date: February 12, 2024

CERTIFICATE OF SERVICE

I, Daniel T. Brier, hereby certify that a true and correct copy of the foregoing Unopposed Motion for Extension of Time was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing by ECF on all counsel of record on this 12th day of February 2024.

/s/ Daniel T. Brier
Daniel T. Brier